

Dear Commissioners,

I am a radio amateur operator, callsign K1KW, licensed for the past forty-three years and a holder of the General RadioTelephone Operator's (previously the "First Class Radiotelephone") License for almost as long. I have been very active operating for this entire period in the amateur allocations that this petition addresses. As a result, I believe I am qualified to comment on RM-11305.

In the one amateur band where there are no mode or bandwidth limitations imposed, 160 Meters, the dire predictions of mayhem that would result due to deregulation simply have not occurred! The long history of behavior by many radio amateurs on 160 M demonstrates that deregulation works very well. During the 'phone and CW contests that are regularly scheduled, band utilization is naturally optimized as the number of stations operating the dominant mode at the time efficiently use the available spectrum. This is not the case for the rest of the amateur bands where much of the time there are vast unused gaps in spectrum allocated for unpopular modes. This is not efficient, creates crowding problems, and contributes to the real cause of discontent mentioned by previous respondents.

As new modes develop and the ratio of mode usage changes over time, deregulation will provide the freedom already enjoyed by the rest of radio amateurs around the world. This will allow our service to live up to its promise and not require a continual string of new rule makings when the next innovations are conceived.

Deregulation as proposed by RM-11305 will not require the FCC to continually look into its crystal ball and guess what the appropriate segmentation of each amateur band should be by mode or bandwidth. It will also minimize the role of the FCC needs to take in micro managing our activities. It's just not needed and RM-11305 is the answer.

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